

Please vote against this proposal.

The risk of explosive accidents is high enough, considering that these trains are the heaviest on the rails, safety provisions are rudimentary to outright inadequate, and similar crude oil trains blew up in Quebec, killing 47, and in North Dakota, miraculously causing only \$ millions in property damage.

But it is certain that these trains will cause deadly air pollution from the "shrinkage" of the cargo en route, a fact that is not addressed adequately in the EIR. This is from an analysis by the Natural Resources Defense Council, cited in an article by the Sierra Club Santa Lucia chapter:

#### [Aside from the Giant Fireball...](#)



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Even if the Phillips 66 project could be guaranteed derailment & explosion free, it should be denied.

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"In the Phillips 66 rail spur project's Environmental Impact Report, nestled in the midst of Impact Summary Tables in a section labeled "CLASS I Impacts – Rail Spur Project: Impacts That May Not Be Fully Mitigated To Less Than Significant Levels," you will find this:

*AQ-5: Operational activities of trains along the mainline rail route associated with the Rail Spur Project would generate toxic emissions that exceed thresholds.*

This is one of eleven significant "impacts that must be addressed in a 'statement of overriding consideration' if the project is approved." That means the County Planning Commission and/or Board of Supervisors must make a legal finding of fact that the benefits which the project will bestow upon the people of San Luis Obispo County are somehow so great, they outweigh its threshold-exceeding toxic emissions, as well as the risk of oil spills, explosions and fires that can be so hot and uncontrollable they must be left to burn themselves out over several days.

But it's not just a matter of debate between those who think that the alleged benefits of the Phillips 66 project would somehow make it worth living in a place with "toxic emissions that exceed thresholds." There's a problem — actually a number of problems — with the Environmental Impact Report on which our decision makers must base that decision. This passage reveals much about the sleight-of-hand tendencies of the EIR:

*Emissions of fugitive hydrocarbons from the Rail Spur Project would be substantially less than that from the existing refinery (1tons/yr versus 33 tons/year). The Applicant indicates the expected [hydrogen sulfide] content of the crude oil vapor could be about one percent by weight.*

Take note: No mention of the difference in the *kind* of emissions represented by the Rail Spur Project vs. the existing refinery's emissions. Existing emissions are not emissions from refining tar sand crude oil, which is loaded with lead, copper, vanadium, and volatile organic compounds — another way in which it differs significantly from San Ardo crude. In a table purporting to represent "Properties of Current and Potential Crude Oils at the Santa Maria Refinery," the EIR does not even include comparative amounts of lead between the refinery's current "typical crude blend" and tar sands crude. (Hint: there's a lot of lead in tar sands oil.) Nor will you find acknowledgment or analysis of the whole chemical cocktail of vaporizing elements, not just (extremely toxic) hydrogen sulfide. Nor is there any acknowledgment or analysis of the fact that the reassuring "one percent by weight" statistic represents 20,000 gallons per train, five times a week, vaporizing and out-gassing as each train rolls through your town en route to the Nipomo Mesa. The NRDC has calculated that a day's worth of vaporizing leakage from a 100-car oil train traveling 260 miles through California roughly equates to nine tons of reactive organic gasses (ROG) released into the air. This phenomenon, known in the trade as "crude shrinkage" or "settling in transit," is absent from the EIR, which does not include these emissions in its emission calculations.

Breathing a cumulative dose of poisons and carcinogens in your daily air supply can make you just as dead as a rapidly expanding fireball. It will just take longer.

Which means if this project gets a permit, it won't just be a potential problem for everyone living in the evacuation zone within one mile of the tracks. It will be a daily, chronic problem for millions of Californians. We will all find out what it feels like to live in an industrial sacrifice zone.

In other words, the fireball is a risk, something project supporters want to bet won't happen here. But threshold-exceeding toxic emissions — at a level even worse than what the project's Environmental Impact Report is willing to admit to — are a sure thing."

Deny the permit.  
Thank you.

Carol Long